

1 ANTHONY J. DIRAIMONDO, ESQ. (NSB #10875)
2 Email: adiraimondo@rrsc-law.com
3 RICE REUTHER SULLIVAN & CARROLL, LLP
4 3800 Howard Hughes Parkway, Ste 1200
5 Las Vegas, NV 89169
6 Telephone: (702) 732-9099
7 PAUL G. KARLSGODT
8 *Pro hac vice*
9 Email: pkarlsgodt@bakerlaw.com
10 BAKER & HOSTETLER LLP
11 1801 California St., Suite 4400
12 Denver, CO 80202
13 Telephone: (303) 861-0600
14 CARRIE DETTMER SLYE
15 *Pro hac vice*
16 Email: cdettmerslye@bakerlaw.com
17 BAKER & HOSTETLER LLP
18 312 Walnut Street, Suite 3200
19 Cincinnati, OH 45202-4074
20 Telephone: (513) 852-2626

21 *Attorneys for Defendant International Game
Technology PLC*

22 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

23 CHARLOTTE BOWNES; JOSEPH
24 LAGRECA; JESSICA NAUMANN; and
25 CHRISTOPHER GOODIN, individually and
26 on behalf of all others similar situated,

27 Plaintiffs,

28 v.

29 INTERNATIONAL GAME TECHNOLOGY
30 PLC; MGM RESORTS INTERNATIONAL;
31 BALLY'S CORPORATION; PENN
32 ENTERTAINMENT, INC.; STATION
33 CASINOS, LLC,

34 Defendants.

35 Case No.: 3:24-cv-00528-ART-CSD

36 **STIPULATION AND [PROPOSED]
37 ORDER TO EXTEND TIME FOR
38 DEFENDANTS TO RESPOND TO
39 COMPLAINT [ECF NO. 1]**

40 **(SECOND REQUEST)**

41

42

43

1 Pursuant to LR IA 6-1, Plaintiffs Charlotte Bownes, Joseph Lagreca, Jessica Naumann, and
2 Christopher Goodin, on one hand, and Defendant International Game Technology, PLC¹, on the
3 other hand, by and through their respective undersigned attorneys of record (collectively, the
4 “Parties”), hereby stipulate and agree subject to the Court’s approval to extend time for defendants
5 to respond to the Complaint (ECF No. 1). The current deadline for Defendant International Game
6 Technology, PLC is January 30, 2025. This is the second request for extension concerning this
7 deadline.

- 8 1. On November 21, 2024, Plaintiffs filed their Complaint (ECF No. 1) against defendants,
9 including Defendant International Game Technology, PLC (Defendant).
- 10 2. On November 25, 2024, Plaintiffs mailed a copy of the Complaint and Summons to a
11 registered agent associated with Defendant (ECF No. 11).
- 12 3. On December 16, 2024, the Court approved an extension of time (ECF No. 19). The
13 current deadline for Defendant to respond to the Complaint (ECF No. 1) is January 30,
14 2025 (ECF No. 19).
- 15 4. Defendant contacted Plaintiffs to discuss its position that International Game
16 Technology, PLC is an improperly named party. The discussions are ongoing.
- 17 5. Other named defendants believe they are improperly named and counsel for proposed
18 substitute defendants has contacted Plaintiffs. These discussions are also ongoing.
- 19 6. Plaintiffs have stated that they intend to amend the complaint to add additional parties
20 and defendants.
- 21 7. Subject to the Court’s approval, the Parties have agreed that all defendants shall have
22 an additional thirty days, up to and including March 3, 2025, to respond to the Complaint
23 (ECF No. 1).
- 24 8. During the requested extension, the parties intend to confer regarding the named
25 defendants and anticipate the filing of an amended complaint. The Parties will confer
26 regarding the filing of any amended complaint and a proposed briefing schedule. The

27
28

¹By entering into this stipulation, Defendant International Game Technology PLC does not waive any arguments related to service of process, jurisdiction or any initial motion defenses.

